IN THE UNITED STATES DISTRICT COURT FOR
WESTERN DISTRICT OF PENNSYLVANIA

ABBY B. CONLEY,	CIVIL DIVISION
Plaintiff,	No.: 05-CV-76 E
-vs-	Judge Sean J. McLaughlin
COUNTY OF ERIE, ERIE COUNTY OFFICE OF CHILDREN AND YOUTH a/k/a ERIE COUNTY CHILD WELFARE SERVICE, RICHARD SCHENKER, individually and in his capacity as County Executive of Erie County, Pennsylvania, PETER CALLAN, individually and in his capacity as Erie County Director of Personnel, DEBRA LIEBEL, individually and in her capacity as Executive Director, Erie County Office of Children and Youth a/k/a Erie County Child Welfare Service, and JOHN A. ONORATO, ESQUIRE, individually and in his capacity as Erie County Solicitor,	
Defendants.	

MOTION TO WITHDRAW AS COUNSEL

AND NOW, comes Edmond R. Joyal, Esquire and the Law Office of Joseph S. Weimer, and hereafter files the within Motion to Withdraw Appearance as follows:

1. Edmond R. Joyal, Jr., Esquire and the law office of Joseph S. Weimer was retained by the St. Paul Fire & Marine Insurance Company to defend its insured, County of Erie and its employees Richard Schenker, Peter Callan, and Debra Liebel, in their official and individual capacities.

2. Since the change of administrations it has been determined that a potential conflict of interest has developed between the interests of the defendants regarding the conduct and defense of this matter.

3. Richard Lanzillo, Esquire has entered his appearance on behalf of the Erie County entities and for the defendants in their official capacities.

4. In that the County defendants do not need two lawyers and two law firms representing its interests, and based on the foregoing paragraph, it is respectfully requested that the appearance of Edmond R. Joyal, Jr., Esquire along with the Law Offices of Joseph S. Weimer be withdrawn for the County of Erie, Erie County Office Of Children And Youth a/k/a Erie County Child Welfare Service.

5. The County of Erie, Erie County Office Of Children And Youth a/k/a Erie County Child Welfare Service, Richard Schenker, in his official capacity, Peter Callan, in his official capacity, Debra Leibel, in her official capacity, and John Onorato and all counsel of record have been notified of the filing of this Motion.

WHEREFORE, it is respectfully requested that this Honorable Court grant the within Motion to Withdraw Appearance.

Respectfully Submitted,

BY: *s/ Edmond R. Joyal, Jr.*

Edmond R. Joyal, Jr., Esquire
PA I.D. #65907
Law Office of Joseph S. Weimer
975 Two Chatham Center
Pittsburgh, PA 15219

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION TO WITHDRAW AS COUNSEL has been served by First Class Mail, postage pre-paid, upon the following parties on this ____6th____ day of March, 2006.

Respectfully Submitted,

BY: *s/ Edmond R. Joyal, Jr.*

Edmond R. Joyal, Jr., Esquire
PA I.D. #65907
Law Office of Joseph S. Weimer
975 Two Chatham Center
Pittsburgh, PA 15219